

# Federal Defenders OF NEW YORK, INC.

Southern District  
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June 17, 2020

**BY ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#:  
DATE FILED: 6/18/20

**Re: United States v. Lawrence Bruce  
20 Cr. 167 (ALC)**

Dear Judge Carter:

I write to respectfully request that the Court temporarily modify Mr. Bruce's bail conditions so that he may complete an application at a Human Resources Administration office on June 19, 2020. On May 8, 2020, Your Honor imposed the following bail conditions: a \$50,000 personal recognizance bond co-signed by one financially responsible person; home incarceration; electronic monitoring; third-party custodianship by Ms. Latoya Bruce; surrender travel documents (and no new applications); strict Pretrial Supervision.

Mr. Bruce seeks permission to travel to a Human Resources Administration office on Friday, June 19, 2020 to complete an application for supplemental nutrition assistance. The office is located at 12 West 14<sup>th</sup> Street, New York, New York. Pretrial Services will schedule the time for Mr. Bruce to leave for the office and return home.

Pretrial Services Officer Carlos Ramirez consents to this request. The Government defers to Pretrial Services on this matter.

Thank you for your consideration of this request.

Respectfully submitted,  
/s/  
Jennifer E. Willis  
Assistant Federal Defender  
(212) 417-8743

**SO ORDERED:**



**HONORABLE ANDREEW L. CARTER, JR.**  
United States District Judge 6/18/20

cc: AUSA Kaylan Lasky (by ECF)  
PSO Carlos Ramirez (by e-mail)